

Acknowledgment

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Introduction

Convicting and incarcerating leaders of criminal enterprises often fails to close down the illegal operation. The enterprise continues because the economic infrastructure remains intact.

Destruction of the financial underpinnings of crime syndicates through asset forfeiture is essential to law enforcement success. All criminal prosecutors and investigators must master the basics of financial investigations if they are to be effective.

This pamphlet is designed to acquaint prosecutors and agents with basic financial investigative techniques that should be considered in every investigation. It is not enough to ask only: “What crime?” and “What defendants?” There is a third question that must be asked at the beginning of each case: “What assets?”

A careful financial investigation can lead from the street dealer to the kingpins. By following the trail of the money and other assets, your financial investigation can reveal the complex structure of major criminal organization, and it can lead to seizures and forfeitures that will cripple those organizations.

As we enter a new millennium of cooperative law enforcement, we must ensure that we are using *all* weapons available to us, including asset forfeiture, which is often the most effective way to permanently dismantle a crime syndicate.

Gerald E. McDowell, Chief
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How to Use this Guide

Why conduct financial investigations? As Willy Sutton said, “Because that’s where the money is.” Financial investigations uncover the proceeds of crime, as well as the trail of evidence that leads investigators to the top of criminal enterprises. Today’s financial crimes often involve complex money laundering schemes. The only way you can prosecute sophisticated criminals is by using financial investigative techniques. The *Financial Investigations Guide* and its companion, *Financial Investigations Checklist*, are designed to help you use these powerful tools.

The *Financial Investigations Guide* has invaluable sources of financial information. We have briefly annotated many of the entries, explaining their usefulness. We have also created a quick reference tool, entitled *Financial Investigations Checklist*, to accompany the guide.

- You know from your surveillance that your subjects frequent a certain residence. Who owns the house? When did they buy it? From whom? How did they pay for it? Who pays the taxes and utilities on it? Take the *Financial Investigations Checklist* with you to the county courthouse. It will lead you to the records that should have the answers.
- You discover that the house is owned by a corporation. Is the corporation registered in your state? When and where was it formed? Who are the directors? Who are the officers? Take the *Financial Investigations Checklist* to the Secretary of State’s office. It will lead you to the records that should have the answers to these questions.
- Your subject has several bank accounts and investments in stocks. Do you know which bank records you should be looking at? Can you trace transactions through a brokerage firm? The *Financial Investigations Checklist* will help you determine which records you need. You can use it to make sure you have all the records listed in your subpoena.

Once you have the records, use the annotated *Financial Investigations Guide* to help you analyze the documents and follow the money trails to their initial sources and ultimate destinations.

You should refer to the *Financial Investigations Guide* as many times as necessary during your investigation for suggested sources of information. Use it as a work plan and as a reference tool for subpoena language for bank or brokerage firm records.

We have not attempted to list all commercial databases or sources of information available at libraries. Rather than naming the hundreds of actual sources of information, we have limited these lists to *types* of information available. Once you determine the type of information you need, you should consult with your public library for the quickest route to obtain the information. The information in many of the databases is also available from the Financial Crimes Enforcement Network (FinCEN). FinCEN will analyze the information for you and comment on the data's significance.

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Databases—Government Law Enforcement

Note: Government law enforcement databases include, but are not necessarily limited to, the following listings.

Bureau of Alcohol, Tobacco, and Firearms

Liquor, firearms, and explosives licensing information

- Manufacturers
- Wholesalers
- Distributors
- Retailers

Registered firearms information

- Machine guns
- Sawed-off shotguns, etc.

Drug Enforcement Administration

Case Status Subsystem (CAST)

- Identification information on case agents' names
- Case number and level
- Date the case was opened
- Date case is due for review
- Office managing the case
- Status of the case

Computerized Asset Program System (CAPS)

- Information on seizures
- Describes assets seized, when, and from where
- Identifies seizing officers
- Describes the ultimate disposition of the assets

- Controlled Substances Act (CSA) File
 - Registrants authorized to handle controlled substances
 - Pharmacists
 - Physicians
 - Importers
 - Exporters
 - Manufacturers
 - Distributors
- Controlled Substances Information System (CSIS)
 - Generic and technical data on controlled substances
 - Physical properties of drugs
 - Hazards (direct and side effects) of listed drugs
 - Street names for drugs
 - Information on clandestine labs
- El Paso Intelligence Center (EPIC)
 - Access to Treasury Enforcement Communication System (TECS)
 - Compilation of data from other law enforcement databases
 - Federal, state, and local inquiries cross index
 - Information from other agencies on subjects being investigated
 - Silent hit program for suspect vehicles entering the United States
- Events System
 - Provides an analytical database for agent and analyst use
 - Permits entry of large numbers of documents
 - Sorts documents
 - Collates documents
 - Performs arithmetic calculations on documents
 - Analyzes documents
 - Determines relationships between documents

NADDIS

- Relevant case data
- Identification information on individuals and companies related to cases
- Known assets
- Business and financial information related to cases

Precursor Chemical Information System (PCIS)

- Information on chemicals necessary for the illicit manufacture of controlled drugs
- Documents the purchase, sale, and shipment of chemicals
- Documents the theft or loss of chemicals

Tolls System

- Provides an analytical database (similar to the Events System) for the analysis of telephone number information

Financial Crimes Enforcement Network (FinCEN)

Provides analytical research services

- Searches databases for evidence or leads to relationships between subjects and other persons or entities
- Provides link analysis to show connections
- Provides interpretations of results
- Provides organization charts based upon research

Provides limited credit information

- Name
- Address
- Spouse's first name

Provides telephone subscription information, including:

- Nationwide telephone searches
- Criss Cross or Haines directory information

- Postal Service address change information
- Provides business data, including:
 - Initial incorporators
 - Key officers
 - Gross receipts and net income
 - Creditors
 - Principle products
- Provides public records information, including:
 - County Court records
 - Secretary of State information
 - Auto tag and license information
- Provides access to government financial databases
 - Currency Transaction Reports, Form 4789 (CTRs)
 - Report of International Transportation of Currency or Monetary Instruments, Form 4790 (CMIRs)
 - Report of Foreign Bank and Financial Accounts, Form 90-22.1 (FBARs)
 - Report of Cash Payments Over \$10,000 Received in a Trade of Business, Form 8300
 - Currency Transaction Reports by Casinos, Form 8362
- Provides information to federal law enforcement and virtually all state and local law enforcement
- FinCEN suggests agencies access their own databases before making requests to FinCEN
- Internal Revenue Service**
 - Currency and Banking Retrieval System
 - CTRs, Casino CTRs, FBARs, and Forms 8300

- Suspicious Transaction Reports
 - Provided by California and Hawaii financial institutions
- Criminal Investigation Management Information System (CIMIS)
 - Open and closed criminal cases
- Seizure and Forfeiture Database
 - Index of Title 31 seizures and forfeitures

INTERPOL

- Access to international network of criminal activity files
- Query by name or business name
- Request intelligence check to get complete file

National Crime Information Center (NCIC) (FBI System)

- Interstate Identification Index File
 - Criminal history
 - Rap sheets
 - Fingerprints
- Files on stolen articles
 - Vehicles
 - License plates
 - Securities
 - Boats
 - Guns
 - Other stolen articles
- Wanted persons (domestic and foreign)
- Unidentified persons file

National Law Enforcement Telecommunications System (NLETS)

- Links system users with law enforcement agencies nationwide
- Registry of auto tags
 - Owner's name
 - Vehicle identification number (VIN)
 - Physical description of listed automobiles
- Information on drivers' licenses
 - Driver's name, date of birth, physical description, and address
 - License renewal date and the type of license issued
- Lists similar information for boat licenses and snowmobile licenses
- Certain criminal history records
- Acts as a nationwide law enforcement message center

Treasury Enforcement Communication Systems (TECS II)

- Access to certain information in TECS is restricted to certain users due to confidentiality of tax return information
- U.S. Customs Service intelligence files
- Links federal law enforcement agencies including INTERPOL
- Customs' lookout and suspect information on persons, vehicles, aircraft, businesses, and vessels
- Federal Aviation Administration (FAA) information, including pilot information and flight plans
- Restricted information on currency reports (CTRs, CMIRs, FBARs, and Forms 8300)
- Has an archives function that tracks individuals entering the United States via commercial airlines
- BATF criminal information files
- Links users to NLETS and NCIC

U.S. Customs Service

- Links users to TECS II
- Contains Customs Artificial Intelligence System (CAIS)
 - Tactical investigative leads
 - Uses Financial Database source information
- Automated Commercial System (ACS)
 - Information on imports into the United States
- Financial data query
 - CTRs, CMIRs, FBARs, Casino CTRs, and Forms 8300
 - Has a unique retrieval capability
- Fraud Data Retrieval System
 - Index to formal consumption and warehouse entries filed with the U.S. Customs Service
- Bank Secrecy Act Audit Results (Non-automated)
 - Department of the Treasury's quarterly reports on BSA violations
 - Bank names are listed in TECS II
- Bank Criminal Referral Forms (Non-automated)
 - Referrals on criminal activities
 - Information is entered into USCS in-house database
- Phony Banks (Non-automated)
 - Lists phony, unofficial, or nonrecognized domestic and foreign financial institutions
 - Bank names are listed in TECS II

Databases—Commercial

 *Note:* Commercial databases are constantly changing. The following listing shows the types of information commonly available from commercial databases.

Financial Data

- Financial information on all publicly held and some privately held companies
- Securities and Exchange Commission (SEC) filings including 8-K, 10-K, 10-Q, and 13-D reports
- Corporate annual reports
- Credit reports
- Information on corporate mergers, reorganizations and consolidations
- Information on corporate affiliations—who owns what
- History of dividends, stock splits, and key financial ratios
- Proxy statements
- SEC and other enforcement actions

News Reports and Articles

- Extracts and complete articles
 - Corporations and businesses
 - Business leaders
 - Employees
 - Legal matters
 - Law enforcement matters
 - Product information
 - Financial information
- Industry newsletters
- Company newsletters

Legal

- Court decisions
- Statutes
- Court orders
- Legal articles

Bibliographies

- Online and non-online databases
- Index to publications of U.S. Congress
- Organizations providing computerized data retrieval services
- U.S. retailers
- Directory information for millions of private and public companies, professional corporations, and partnerships
- Corporate affiliations, offices, subsidiaries, market territories, products, services, officers, directors, and employees
- Associations, trade groups, labor unions, and similar organizations

Financial Ratios, Averages, and Norms

- Typical sales, cost of sales, gross profit, net profit, and related financial figures by industry groupings based upon business volume
- Typical number of employees, salaries, and hours of work by industry groupings

Public Records

Bankruptcy Records (Federal Bankruptcy Court)

- Information about bankruptcy
- Assets at time of bankruptcy
- Creditors at time of bankruptcy

- Often provides an excellent starting point for net worth purposes
- Leads to angry creditors
- Leads to hidden assets

Civil and Criminal Court Records (County and State Records)

- Civil suits and settlements
- Criminal actions

- Leads to hidden transactions or assets revealed through civil suits
- Leads to witnesses who may be hostile to the subject
- Leads to aliases, multiple Social Security numbers, or previously unknown addresses
- Leads to previously unknown affiliations with other persons or entities

Divorce and Legal Separation Records (County Records)

- Leads to hidden transactions or assets revealed through divorce proceedings
- Leads to witnesses who may be hostile to the subject
- Leads to previously unknown affiliations with other persons or entities

Judgment Index (County Records)

- Civil judgments against target
- Names complainant
 - Leads to previously undisclosed assets used to satisfy judgments
 - Leads to angry creditors
 - Leads to previously undisclosed affiliations with other persons or entities

Libraries

- Financial Data
 - Financial information on all publicly held and some privately held companies
 - SEC filings including 8-K, 10-K, 10-Q, and 20-F reports
 - Information on corporate mergers, reorganizations and consolidations
 - Information on corporate affiliations—who owns what
 - History of dividends, stock splits, and key financial ratios
- News Reports and Articles
 - Reader's Guide to Periodical Literature*
 - Digests of legal articles
- Legal
 - Court decisions
 - Statutes
 - Court orders
 - Legal articles
- Biographical Information and Bibliographies
 - Corporate managers, directors, and executives
 - America's wealthiest people—with philanthropic affiliations

- Genealogy indices
- Who's Who*
- Contemporary news makers
- Judges
- Lawyers and law firms—with major clients listed
- State governments, elected state officials, state agencies and departments, state employees, and related information
- Federal agencies directories
- Congressional directories
- Directories of professions—medical, dental, CPAs, realtors, insurance, stock brokers, etc.
- Directories of licensing agents—personalities, sports teams, actors, writers, etc.
- Aircraft registry, manufacturers, titles, etc.
- Directories of financial institutions
- Directories of bank routing numbers
- Bibliographies and indices of information available in libraries
- Guides to directories covering all industrial, professional and mercantile categories
- National Business Telephone Directory*
- Directory of VISA and MasterCard issuing banks
- Directory of gaming establishments
- Directory of government directories
- National Post Office and Zip Code Directory*
- Criss Cross directories
- Directories of databases
- Directory of Federal Laboratory and Resources*—a guide to facilities and expertise available
- Directories of business information sources

- Financial Ratios, Averages, and Norms
 - Publications covering typical sales, cost of sales, gross profit, net profit, and related financial figures by industry groupings based upon business volume
 - Publications covering typical numbers of employees, salaries, and hours of work by industry groupings

Licensing Bureau (County and State Records)

Automobile License Bureau (County and State Records)

- Owner's name
- Vehicle identification number (VIN)
- Physical description of listed automobiles
- Can be accessed through nationwide database, but may need certified copy for court

Drivers License Bureau (County and State Records)

- Driver's name, date of birth, physical description, and address
- License renewal date and the type of license issued
- Can be accessed through nationwide database, but may need certified copy for court

Marriage Licenses and Professional Licenses

- Medical
- Dental
- Insurance agency
- Stock broker
- Real estate broker
- Attorney
- Certified Public Accountant
- Concealed weapons
- Gun permits

Liquor Licenses

Notary Licenses

Probate and Death Records (County Records)

- Administrators and Guardians
- Leads to beneficiaries
- May be used to refute an inheritance defense in a net worth or expenditures case
- Leads to previously undisclosed assets

Real Estate Records

Building Permit Register

Building permits applied for

- Indexed by property address
- Indexed by applicant name

- Contractor's name and address
- May reveal hidden property
- May reveal payments by third parties for improvements on property
- Leads to previously unknown affiliations with other persons or entities
- May provide evidence of beneficial ownership of the property

Grantor and Grantee Records

- Deeds
- Real estate agreements
- Liens and lien releases
- Real estate mortgages
- Chattel (personal property) mortgages
- Options to buy
- Easements and easement releases

Maps and Plats

- Compare county maps and plats with aerial photos, measured mileage, surveillance notes, etc.
- Use coordinates or other identification on maps and plats to determine property ownership and address.

Mechanics Liens Register

- Mechanics liens filed against property
- May reveal new construction
- May reveal property improvements

- May reveal hidden property
 - May reveal payments by third parties for improvements on property
 - Leads to previously unknown affiliations with other persons or entities
 - May provide evidence of beneficial ownership of the property
-
- Real Estate Nationwide Computer Databases
 - Limited to real estate listings in major cities
 - Expensive, but may be less expensive than sending an agent to many county court houses if many counties need to be searched
 - Inquiries must be accurate, and detailed in order to access the correct information
 - The computer print out received will probably not be admissible in court, and true copies will still need to be obtained
-
- Tax Assessor's Records
 - May indicate separate assessed values for land and improvement
 - Cross reference property by legal description
 - Who pays taxes on the property
 - Address where the property tax bills are being sent
 - May cross-reference other properties whose tax bills are being sent to same address
 - May cross-reference other properties on which subject is paying taxes
 - May provide previously undisclosed relationships with other persons or entities
 - May provide evidence of beneficial ownership of the property

Utility Findings

Requests for extension of utility services

- Sewer hook-ups
- Water hook-ups
- Electrical and phone hook-ups

- Leads to new construction of previously undisclosed assets
- Leads to previously unknown affiliations with other persons or entities
- May provide evidence of beneficial ownership of the property

Secretary of State Records

- Identification information on all corporations incorporated or doing business in the state
- Identification information on all partnerships and professional associations formed or doing business in the state
- Names of all incorporators or general partners
- Names of registered agents
- Numbers and types of shares issued

- Leads to previously undisclosed affiliations with other persons or entities
- May provide evidence of beneficial ownership of business entity
- Leads to witnesses, principals or co-conspirators
- Leads to previously undisclosed assets

State Gaming Commission

- Owners of gaming establishments
- Names of persons banned from gaming establishments
- Financial information on gaming establishments

State Vital Statistics Bureau

- Births
- Deaths
- Adoptions

Trade Name Index (County Records)

- Trade names of businesses, including corporations, partnerships, professional corporations and sole proprietorships doing business in the county
- Addresses of businesses
- Name, address and identity of owners
- Leads to previously undisclosed affiliations with other persons or entities

Uniform Commercial Code Index (County Records)

- Liens secured by personal property (all property not considered real estate)
 - Names of creditors
 - Amounts financed
 - Value of the property used as security
 - Names of debtors
 - May reveal previously undisclosed assets
 - Automobiles
 - Jewelry
 - Art work
 - Furs
- Financial statements filed by businesses and individuals
 - Leads to previously undisclosed assets or liabilities
 - May provide starting point for net worth method of proof

Other Records

 *Note:* Many of these records are confidential and may be obtained only through appropriate administrative or judicial process.

Bank Examination Records

- Federal Deposit Insurance Corporation (FDIC)
- Federal Reserve System (FRS)
- Office of Comptroller of the Currency (OCC)
- Office of Thrift Supervision (OTS)
- National Credit Union Administration (NCUA)
- State Banking Supervisors

Bureau of Public Debt

- Cash purchases of Treasury bills

Coast Guard

- Records of vessels equipped with permanently installed motors
- Records of vessels over 16 feet equipped with detachable motors

Credit Card Companies

- American Express
- Visa
- MasterCard
- Diners Club
- Carte Blanche
- Cards issued by financial institutions
- Other issuers of credit cards

Department of Defense

- Financial information on military personnel in the Army, Navy, or Air Force

- Defense Investigative Service
 - Case files on individuals who have been investigated by Department of Defense investigative services

Department of State

- Passport records
- Visa records

Federal Aviation Administration (FAA)

- Complete data on aircraft
 - Identification information on owners and previous owners
 - Date sold
 - Serial number
 - Make and model
 - Aircraft history
- Identification information on licensed pilots

Federal Reserve System

- Summary statistics of currency in circulation
- Currency received from and sent to selected countries
- Transactions between specific banks or branches and FRS member banks

Financial Institutions—Other or Nontraditional

- Postal Service (*see below*)
- Wester Union (funds transmissions)
- Casinos
- Quick stop grocery stores (money orders)
- Funds transmitters
- Check cashing businesses
- Casas de cambio
- Travel agencies

Immigration and Naturalization Service

- Identification information on immigrants and aliens
- Lists of passengers and crews on vessels from foreign ports
- Naturalization records
- Deportation records
- Financial statements of aliens and persons sponsoring their entry

Office of the Comptroller of Currency (OCC)

- Reports of Examination of National Banks
- National Bank Surveillance System
 - Performance reports
 - Peer grouping analysis
- Offshore Shell Banks
 - Licensed
 - Those whose licenses have been suspended
 - Criminal Referral Forms

Parole and Probation Departments (Local, State, and Federal)

Police Files (Local and State)

- Criminal history files
- Rap sheets
- Fugitive information
- Stolen property reports

Postal Service (Postal Inspection Service)

- Postal money orders
- Addresses
- Mail covers

Securities and Exchange Commission (SEC) Records

- Form 10-Q, Quarterly Corporate Financial Report
- Form 8-K, Monthly Corporate Report
 - Changes in control of registrant
 - Change in registrant's certifying accountant
 - Other material events
- Form 8 amends other corporate filings
- Form 13-D, Report of Stockholder
 - Filed by stockholders holding more than 5 percent of the stock
 - Details of stock acquisition
 - Source of money used to buy stock
- SEC enforcement files
 - Corporate documents
 - Documents from third parties
 - Witness statements

Tax Files (Local, State, and Federal)

- Sales and use tax
- Personal property tax
- Real property tax
- Business license tax
- Income tax
- Gift tax
- Inheritance tax
- Social Security tax (FICA)
- Unemployment tax (FUTA)

Telephone Company

- Long distance calls

- Records of payment
 - Who makes the payment?
 - How payment was made
 - Item (checks, etc.) used to make the payment

- Assistance in electronic surveillance of telephone conversations

Trash Searches

- Records obtained by searching through subject's trash

Utility Companies

- Water
- Sewer
- Trash hauling
- Electricity
- Gas
- Telephone
- Leads to third parties, principals, and hidden assets
 - May reveal third parties who are paying the bills
 - May reveal bills on other properties being paid by the same person or company
 - May reveal previously undisclosed bank accounts from which bills are being paid
 - Leads to hidden property on which bills are being paid

Veterans Administration

- Financial information relating to veterans
 - Loans
 - School tuition payments
 - Insurance payments
 - Certain medical records

Banks and Financial Institutions

The Right to Financial Privacy Act (What information can banks voluntarily provide?)

- Name or other identifying information of:
 - A corporation
 - An individual
 - An account
- The account number
- The type of account
- The nature of any suspected illegal activity
 - Specific offenses
 - Dates
 - Suspicious activities
- The identity of the financial institution or officer

Account Records (Open and Closed Accounts)

- Signature Cards
 - Shows who can sign on the account
- Corporate board authorization minutes or partnership resolution
 - May list other corporate officers, board members, or partners
 - Provides the names of the company or persons who control the account
 - May provide previously undisclosed relationships with other persons or entities
 - May provide evidence of beneficial ownership of account

- Bank Statements
 - Provides a summarized history of all transactions in the account

- Canceled Checks
 - Trace to ultimate disposition
 - Evidence of disbursements
 - Leads to previously undisclosed assets purchased with checks
 - Leads to third parties, principals, or co-conspirators who receive payments by checks

- Deposit Tickets
- Items Deposited
 - Trace to initial source
 - Evidence of receipts
 - Leads to previously undisclosed assets sold or used to fund the deposits
 - Leads to third parties, principals, or co-conspirators who funded the deposits

- Credit and Debit Memos
 - Leads to unusual transactions
 - Loan proceeds or repayments
 - Wire transfers in or out
 - Purchases of bank checks, travelers's checks, or money orders
 - Purchase or redemption of CDs or securities
 - Payments to or receipts from other accounts with the same financial institution

 - Leads to previously undisclosed assets used to fund credit memos or purchased with funds reflected in debit memos

- Leads to third parties, principals, or co-conspirators who funded credit memos or who received funds reflected by debit memos
- Forms 1099, 1089, or Back-up Withholding Documents
- Bank Checks (Cashier's Checks, Manager's Checks, Treasury Checks, Traveler's Checks, or Money Orders)**
 - Items (checks, debit memos, cash in tickets, wires in, etc.) used to purchase the checks
 - Trace to initial source
 - Evidence of disbursements
 - Leads to previously undisclosed assets used to purchase the instruments
 - Leads to third parties, principals, or co-conspirators who provided the funds to purchase the instruments
 - Items (bank checks, credit memos, cash out tickets, wires out, etc.) purchased with the checks
 - Trace to ultimate disposition
 - Evidence of receipts
 - Leads to previously undisclosed assets purchased with the proceeds
 - Leads to third parties, principals, or co-conspirators who received the proceeds
 - Applications for purchase of bank checks
 - May show who purchased the instruments
 - Leads to third parties, principals, or co-conspirators who purchased the instruments for the subject
 - Retained copies of negotiated bank checks
 - Evidence of receipts and disbursements
 - May show where the documents were negotiated

- Leads to undisclosed bank accounts where instruments were negotiated or deposited
- Leads to previously undisclosed assets purchased with the instrument
- Endorsements may provide leads to previously undisclosed relationships with other persons or entities

Certificates of Deposit (CDs—Open and Closed)

- Copies of certificates
- Corporate board authorization minutes or partnership resolutions
 - Will generally list other corporate officers, board members, or partners
 - May reveal previously undisclosed relationships with other persons or entities
 - May reveal evidence of beneficial ownership of CDs
- Items (checks, debit memos, cash in tickets, wires in, etc.) used to purchase the CDs
 - Trace to initial source
 - Evidence of purchase
 - Leads to previously undisclosed assets used to buy the CD
 - Leads to third parties, principals, or co-conspirators who provided the funds to buy the CD
- Items (bank checks, credit memos, cash out tickets, wires out, etc.) purchased with cashed-in CDs
 - Trace to ultimate disposition
 - Evidence of redemption and disbursement
 - Leads to previously undisclosed assets purchased with the proceeds
 - Leads to third parties, principals, or co-conspirators who received the proceeds

- Records reflecting interest earned, withdrawn, or reinvested
- Records reflecting roll-overs
- Forms 1099, 1089, or back-up withholding documents

Correspondence (Between the Bank and Bank Regulators or Law Enforcement Officials)

- May provide previously unknown leads or evidence relating to the investigation

Credit Cards (Open or Closed)

- Applications for credit

- May reveal previously undisclosed assets
- May reveal previously undisclosed credit cards

- Corporate board authorization minutes or partnership resolutions

- Will generally list other corporate officers, board members, or partners
- May reveal previously undisclosed relationships with other persons or entities
- May reveal evidence of beneficial ownership of the credit card

- Credit reports

- May reveal previously undisclosed assets
- May reveal angry creditors
- May reveal previously undisclosed credit cards

- Monthly statements

- May provide evidence that can be used in an expenditures case
- Leads to previously undisclosed assets which were purchased by credit card

- Leads to third parties, principals, or co-conspirators who made payments on the credit card
- Financial statements
 - May provide starting point for net worth or expenditures method of proof
 - Leads to previously undisclosed assets and liabilities listed on the financial statements
 - May reveal large discrepancies in income or net worth between what is listed on the financial statements and what is documented elsewhere in the case
- Charge tickets
 - Evidence of expenditures
 - May provide evidence that can be used in an expenditures case
 - Leads to previously undisclosed assets which were purchased by credit card
 - Leads to third parties, principals, or co-conspirators who made purchases with the credit card
- Items (checks, debit memos, cash in tickets, wires in, etc.) used to make payments on account
 - Trace to initial source
 - Evidence of payments
 - Leads to previously undisclosed assets used to make payments on the account
 - Leads to third parties, principals, or co-conspirators who made payments on the account
- Correspondence files
- Criminal Referral Forms**
 - May provide evidence of suspicious transactions conducted by or on behalf of the subject

CTRs and CMIRs

- Document currency transactions
- Addresses, identification numbers, and business relationships of customer
- May reveal previously undisclosed relationships with other persons or entities
- May provide evidence of cash receipts and expenditures for use in net worth or expenditures method of proof

Customer Correspondence Files

- Correspondence between the subject and the bank
- Leads to other assets
- Leads to previously undisclosed relationships with other persons or entities

Exemption Lists

- Requests sent to the Internal Revenue Service for exemptions
- Written customer statements submitted to the bank in support of exemptions
- May reveal previously undisclosed business of subject
- May provide evidence of currency receipts of subject's business

Loan Records (Open and Closed Loans)

- Loan applications
- Financial records

- May provide starting point for net worth or expenditures method of proof
- Leads to previously undisclosed assets and liabilities listed on the financial statements
- May reveal large discrepancies in income or net worth between what is listed on the financial statements and what is documented elsewhere in the case

- Corporate board authorization minutes or partnership resolution
 - Will generally list other corporate officers, board members, or partners
 - Identification information on the persons or company seeking the loan
 - May reveal previously undisclosed relationships with other persons or entities
 - May provide evidence of beneficial ownership of the loan or assets purchased with the loan

- Loan ledger sheets
 - Summarizes loan amount, payments, and interest charged

- Loan amortization schedules
 - Indicates the normal loan repayment and interest accrual schedule for a given loan over a given term with a given interest rate
 - Compare this with actual terms and repayments for unusual transactions

- Evidence (bank checks, credit memos, cash out tickets, wires out, etc.) of loan disbursement
 - Evidence of the loan
 - May indicate the loan was used for something other than its stated purpose
 - May indicate the loan proceeds were paid to a previously undisclosed person or entity
 - May provide evidence of beneficial ownership of the loan or assets purchased with the loan

- Items (checks, debit memos, cash in tickets, wires in, etc.) used for loan repayments
 - Evidence of repayment

- May reveal hidden accounts or assets used to make repayments on the loan
 - May reveal third parties making payments on the loan
 - May reveal sudden increases in wealth used to repay the loan
 - May provide evidence of beneficial ownership of the loan
- Loan correspondence files
- Letters, notes, or memos concerning the loan
 - May reveal previously undisclosed assets
 - May reveal previously undisclosed relationships with other persons or entities
 - May provide evidence of beneficial ownership of the loan or assets purchased with the loan
- Real Estate, chattel mortgages, or other security instruments for loans
- May reveal previously undisclosed assets that are used as security for the loan
- Collateral agreements or documents pertaining to collateral given for the loan
- May reveal third parties cosigned or produced collateral for the loan
 - May reveal previously undisclosed assets used to collateralize the loan
 - May provide evidence of beneficial ownership of the loan or assets purchased with the loan
- Credit reports
- May reveal previously undisclosed assets
 - May reveal angry creditors
 - May reveal previously undisclosed credit cards

- Notes or other instruments reflecting the obligation to pay
 - Evidence of the loan
 - May reveal cosigners of the note
 - May reveal previously undisclosed relationships with other persons or entities
- Forms 1099, 1089, or back-up withholding documents

Safe Deposit Box Records (Open and Closed)

- Contracts
 - Identification information on persons having access to the box
- Corporate board authorization minutes or partnership authorizations
 - Will generally list other corporate officers, board members, or partners
 - May reveal previously undisclosed relationships with other persons or entities
 - May reveal evidence of beneficial ownership of the box
- Entry records
 - Can be compared with surveillance notes to document currency payments made from the box to third parties (car purchase, etc.)
 - Can be compared with surveillance notes to document probable cause for search, seizure or forfeiture

Security of Investment Custodian Accounts (Open and Closed Securities Accounts, IRAs, or Keogh Plans)

- Items (checks, debit memos, cash in tickets, wires in, etc.) used to purchase the securities
 - Trace to initial source

- Evidence of ownership of securities
 - Leads to previously undisclosed assets used to purchase the security
 - Leads to third parties, principals, or co-conspirators who provided the funds to buy the securities
- Items (bank checks, credit memos, cash out tickets, wires out, etc.) purchased with cashed in securities
- Trace to ultimate disposition
 - Evidence of redemption and disbursement
 - Leads to previously undisclosed assets purchased with the proceeds
 - Leads to third parties, principals, or co-conspirators who received the proceeds
- Confirmation slips
- Evidence of transactions
 - Fix the date and price of the transaction
 - Trace all receipts into the account to their initial source
 - Trace all disbursements from the account to their ultimate disposition
- Monthly statements
- Summarized history of all transactions in the account
- Payment receipts
- Trace all payments to initial source
 - Evidence of receipts into account
 - Indicate how payment was made
 - Leads to previously undisclosed assets used to purchase the security
 - Leads to third parties, principals, or co-conspirators who provided the funds to buy the securities
 - May provide evidence of cash expenditures

- Safekeeping records and logs
 - Securities held for the subject by the brokerage house
 - May provide evidence of previously undisclosed assets in the form of securities held or transferred into the account
- Receipt or delivery of securities
 - Evidence of receipt or delivery of securities
 - May reveal a hidden source of securities previously held and transferred into or out of the account
 - Leads to other brokerage accounts from which securities were transferred into the known account
- Forms 1099, 1089, or back-up withholding documents

Teller Tapes

- Normally used as a last resort in tracing transactions
- Normally used to document currency transactions

Wire Transfers

- Chips, Fed Wire, SWIFT, or other money transfer or message documents
 - Source or destination of wire transfers
 - Detailed information on wire transfers
- Items (checks, debit memos, cash in tickets, wires in, etc.) used to buy the wires
 - Trace to initial source
 - Evidence of disbursements
 - Leads to previously undisclosed assets used to purchase the wire transfer
 - Leads to third parties, principals, or co-conspirators who provided the funds to purchase the wire transfer

- Items (bank checks, credit memos, cash out tickets, wires out, etc.) purchased with wires received
 - Trace to ultimate disposition
 - Evidence of receipts
 - Leads to previously undisclosed assets purchased with the proceeds of the wire transfer
 - Leads to third parties, principals, or co-conspirators who received the proceeds of the wire transfer

- Notes, memoranda, or other writings pertaining to the sending or receipt of wire transfers

Securities and Commodities Brokerage Firms

Account Statements

- Summarizes all transactions in the account on a monthly basis
 - Purchases and sales of securities
 - Stocks
 - Bonds
 - Mutual funds
 - Limited partnership shares
 - Individual Retirement Plans (IRAs)
 - Keogh Plans
 - Stock and cash dividends
 - Interest accrued or due
 - Payments on margin
 - Stock splits
- Similar to a bank statement

Application to Open Accounts

- Identification information on the account holder
- May reveal previously undisclosed accounts with other brokerage firms
- Leads to previously undisclosed assets
- Leads to or evidence of income
- Leads to relationships with other financial institutions

Application to Open Margin Accounts

- May provide starting point for net worth or expenditures method of proof
- Leads to previously undisclosed assets and liabilities listed on the financial statements
- May reveal large discrepancies in income or net worth between what is listed on the financial statements and what is documented elsewhere in the case

Cash Management Account Statements

- Securities account combined with a bank account
- Account receipts and disbursements
- Securities receipts and disbursements
- Securities position
- Credit card charges and payments

Cash Received and Delivered Blotter

- Evidence of receipts into and payments out of the account
- Payments received from and made to the customer
- Similar to a bank statement

Confirmation Slips

- Evidence of transactions
- Fix the date and price of the transaction
- Trace all receipts into the account to their initial source
- Trace all disbursements from the account to their ultimate disposition

Corporate Board Authorization Minutes or Partnership Resolutions

- Will generally list other corporate officers, board members, or partners
- Identifies the person or company seeking the margin account
- May provide previously undisclosed relationships with other persons or entities
- May provide evidence of beneficial ownership of the loan or assets purchased with the loan

CTRs and CMIRs

- Document currency transactions
- Addresses, identification numbers, and business relationships of customer
- May reveal previously undisclosed relationships with other persons or entities

- May provide evidence of cash receipts and expenditures for use in net worth or expenditures method of proof

Customer Correspondence Files

- Details establishing transactions to be conducted strictly by mail or phone
- May provide leads to previously undisclosed relationships with other persons or entities

Dividend Disbursing Agent Records

- Evidence of dividend payments
- Record of all dividends on client corporations' stocks
- Canceled checks will show where dividend checks were negotiated
- Leads to previously unknown shares on which dividends have been paid

Payment Receipts (Currency Receipts or Check or Wire Payment Receipts)

- Evidence of receipts into account
- Trace payments received to their initial source
- Obtain copies of items deposited (including wire transfers in) from the bank records of the brokerage firm
- May provide evidence of previously undisclosed bank account used to purchase securities
- Leads to previously undisclosed assets sold or used to fund the purchase of securities
- Leads to third parties, principals, or co-conspirators who provided funds for the purchase of securities

Payment Receipts (Securities Transferred in Receipts)

- Evidence of receipts into the account
- Leads to previously undisclosed brokerage accounts
- Leads to previously undisclosed securities delivered out to subject

- Leads to third parties, principals, or co-conspirators who held the securities transferred in or received the securities transferred out

Security Depository Firm Records

- Evidence of securities ownership
- Depository for securities held by brokerage firms for customers in the brokerage firm's name (street name)
- The customer's holdings are shown in the brokerage firm's records. These include the securities position record, and the records of the individual customers.

Securities Position Records

- Evidence of securities ownership
- Shows the customer's position in all securities held on behalf of the customer by the brokerage firm (securities held in the street name)

Stock Certificates or Bonds

- Evidence of ownership of shares of stocks or bonds
- Shows the number of shares, certificate number, and CUSIP number
- Endorsement of stock delivered out will show prior owner

Stock Delivery Reports

- Evidence of stock delivery
- Receipt for stock delivered from the brokerage firm to the owner

Stock Transfer Agent Records

- Evidence of ownership of shares of stock
- Record of all stock purchases and sales for all securities handled by the transfer agent for client corporations

- Historical record of ownership for a company's stock

- Provides a chain of ownership and lists the brokerage houses used for transfers

- Leads to previously undisclosed securities held by other brokerage firms or delivered out to the subject
- Will show where subject purchased stock transferred into a known account
- Will show where subject sold stock previously delivered out of an account

Net Worth

Assets - Liabilities = Net Worth

- Use historical cost of assets, not market value

Net Worth Increases over a Fixed Period (Normally One Year) Represent Income

- Determine the subject's net worth on December 31 for two or more years
- The increase in net worth from year to year represents income
- Attempt to document at least three years
- Develop a "starting point" from which all net worth increases grow

Expenditures (Payments Not Used to Buy Assets or Reduce Liabilities) Represent Additional Income during any Given Period of Time

- Food
- Clothing
- Rent
- Interest on mortgages (but not principal)
- Utilities
- Vacations
- Payments on credit cards

Increase in Net Worth + Expenditures = Available Income

Available Income must be Reduced by Legitimate Sources of Income in order to Prove Income from Unknown (or Illegal) Sources

- Legitimate employment
- Inheritance
- Gifts
- Gambling winnings
- Proven cash hoards

**Available Income - Proven Legitimate Sources of Income
= Income from Unknown (or Illegal) Sources**

**Document Beginning Cash on Hand to Refute a Cash
Hoard Defense**

- Investigate all leads to cash hoards or cash on hand (cash hoarded in shoe box, mattress, buried in back yard, etc.)
 - Evidence of gifts
 - Inheritances
 - Insurance proceeds
 - Gambling winnings
 - Cash held for others
 - Cash held by others for the subject

- Cash hoard defenses can be refuted by other evidence
 - Evidence of a need to borrow substantial funds
 - Financial statements filed which show no evidence of cash hoard
 - Evidence that purchases were deferred until funds could be accumulated
 - Statements to business associates or third parties regarding lack of cash
 - Initial admissions to law enforcement officers or others

- Search for assets, liabilities, and expenditures prior to the base net worth year
 - Evidence from this period will help substantiate the base year net worth
 - Evidence from this period will help document cash on hand

**Consider Using Net Worth under the Following
Circumstances**

- There is no direct link between the subject and the alleged illegal activity

- The subject has acquired many assets or has a dramatic increase in net worth
- The subject is a “high roller”
- Financial records are unavailable or unreliable
- The case-in-chief needs corroboration
- The case hinges on a weak confidential source of information
- The case involves a small quantity of drugs seized

- Prove Net Worth with Evidence of Ownership of Assets and Liabilities as a Given Set of Dates, as well as Evidence of Expenditures Between the Dates**

- Prove Beneficial Ownership of Assets Held by Others**
 - Who provided the funds to buy the asset, or pay off the loan?
 - Who uses the asset and what is their relationship to the subject?
 - In whose name is the asset titled?

- Prove Expenditures Made for Defendant by Others**
 - Who made the payment?
 - Who benefitted from the payment?

- Prove Assets Held Over Several Net Worth Periods were Owned on Each Net Worth Date**
 - Surveillance
 - Testimony of witnesses
 - Continued listing on insurance policies
 - Evidence of subsequent sale

- The Government’s Expert Witness Keeps Track of which Items are Admitted into Evidence and Summarizes the Case for the Court**
 - The expert will base his/her testimony upon only those items admitted into evidence
 - The expert will draw conclusions as to the defendant’s income based upon admitted evidence

Model Subpoena Language

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Financial Institution Records

... to bring with you and produce:

The following documents for all accounts bearing the signatory authority of (names) and/or in the name(s) of (names), and/or bearing the account number(s) (account numbers), for the period _____ to _____ including, but not limited to:

- All documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:
 - Signature cards
 - Corporate board authorization minutes or partnership resolutions
 - Bank statements
 - Canceled checks
 - Deposit tickets
 - Items deposited
 - Credit and debit memos
 - Forms 1099, 1089, or back-up withholding documents

- All documents pertaining to open or closed bank loans or mortgage documents, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to:
 - Loan applications
 - Corporate board authorization minutes or partnership resolutions
 - Loan ledger sheets
 - Documents (checks, debit memos, cash in tickets, wires in, etc.) reflecting the means by which loan repayments were made
 - Documents (bank checks, credit memos, cash out tickets, wires out, etc.) reflecting disbursement of the loan proceeds

- Loan correspondence files including, but not limited to:
 - Letters to the bank
 - Letters from the bank
 - Notes, memoranda, etc. to the file

- Collateral agreements and documents
- Credit reports
- Financial statements
- Notes or other instruments reflecting the obligation to pay
- Real estate mortgages, chattel mortgages, or other security instruments for loans
- Forms 1099, 1089, or back-up withholding documents
- Loan amortization statements

- All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to:
 - Copies of the certificates
 - Corporate board authorization minutes or partnership resolutions
 - Documents (checks, debit memos, cash in tickets, wires in, etc.) reflecting the means by which the CD was purchased
 - Documents (bank checks, credit memos, cash out tickets, wires out, etc.) reflecting disbursement of the proceeds of any negotiated CD
 - Records reflecting interest earned, withdrawn or reinvested
 - Records reflecting roll-overs
 - Forms 1099, 1089, or back-up withholding documents

- All documents pertaining to open or closed investment or security custodian accounts, IRA, Keogh, or other retirement plans in the name of or for the benefit of any of the named parties or entities including, but not limited to:
 - Documents (checks, debit memos, cash in tickets, wires in, etc.) reflecting the means by which the security was purchased
 - Documents (bank checks, credit memos, cash out tickets, wires out, etc.) reflecting disbursement of the proceeds of any negotiated securities

- Confirmation slips
 - Monthly statements
 - Payment receipts
 - Safekeeping records and logs
 - Receipts for receipt or delivery of securities
 - Forms 1099, 1089, or back-up withholding documents
- Customer correspondence files for each of the named parties and entities
- All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities including, but not limited to:
- Documents (checks, debit memos, cash in tickets, wires in, etc.) reflecting the means by which the checks or money orders were purchased
 - Documents (bank checks, credit memos, cash out tickets, wires out, etc.) reflecting disbursement of the proceeds of any negotiated checks or money orders
 - Applications for purchase of checks or money orders
 - Retained copies of negotiated checks or money orders
- All documents pertaining to wire transfers sent or received by any of the named parties or entities including, but not limited to:
- Fed Wire, CHIPS, SWIFT, or other money transfer or message documents
 - Documents (checks, debit memos, cash in tickets, wires in, etc.) reflecting the source of the funds wired out
 - Documents (bank checks, credit memos, cash out tickets, wires out, etc.) reflecting the ultimate disposition within the bank of the funds wired in
 - Notes, memoranda, or other writings pertaining to the sending or receipt of wire transfers

- All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities including, but not limited to:
 - Contracts
 - Entry records

- All documents pertaining to open or closed bank credit cards in the name of or under the signatory authority of any of the named parties or entities including, but not limited to:
 - Applications for credit
 - Corporate board authorization minutes or partnership resolutions
 - Credit reports
 - Monthly statements
 - Financial statements
 - Charge tickets
 - Documents (checks, debit memos, cash in tickets, wires in, etc.) reflecting payments on the account
 - Correspondence files

- Teller tapes reflecting all transactions between the bank and any of the parties or entities named

- All CTRs (Form 4789) and CMIRs (Form 4790) filed with the Department of the Treasury, Internal Revenue Service, or the U.S. Customs Service by the (bank name) between (dates) concerning currency transactions conducted by or on behalf of the named parties or entities

- Copies of the following documents, if any, filed by the (bank name) with the aforementioned federal agencies, the Drug Enforcement Administration, the Federal Bureau of Investigation, the Department of Justice, or any bank regulatory agency concerning transactions by, on behalf of, or involving the named parties or entities:
 - Criminal Referral Form (short form); Office of the Comptroller of the Currency (OCC)—OCC Form CC-8010-08

- Criminal Referral Form (short form); The Board of Governors of the Federal Reserve System—Federal Reserve Form FR2230
- Report of Apparent Crime (short fom); Federal Deposit Insurance Corporation (FDIC)—FDIC Form 6710/06

- Any and all “exemption lists,” requests for exemptions, and statements submitted in support of such requests filed with the Internal Revenue Service pursuant to 31 U.S.C. § 103.22 concerning the named parties or entities

- Any and all correspondence, letters, or documents reflecting telephone conversations or meetings between the (bank name) and any bank regulatory or federal law enforcement agency regarding suspicious transactions, pending investigations or ongoing investigations relating to any of the named parties or entities

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Corporate Records

... to bring with you and produce:

The following documents for the period _____ to _____
including, but not limited to:

- Retained copies of all documents relating to (corporate name) banking transactions including, but not limited to:
 - All documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts held in the name of, for the benefit of, or under the control of (corporate name) including, but not limited to:
 - Retained copies of signature cards
 - Corporate board authorization minutes or partnership resolutions
 - Bank statements
 - Canceled checks
 - Deposit tickets
 - Retained copies of items deposited
 - Credit and debit memos
 - Forms 1099, 1089, or back-up withholding documents
- All documents pertaining to open or closed bank loans or mortgage documents, reflecting loans made to, cosigned by, or made for the benefit of (corporate name) including, but not limited to:
 - Loan applications
 - Corporate board authorization minutes or partnership resolutions
 - Loan statements
 - Documents (checks, debit memos, cash receipts, wire transfer documents, etc.) reflecting the means by which loan repayments were made
 - Documents (bank checks, credit memos, wire transfer documents, etc.) reflecting disbursement of the loan proceeds

- Copies of loan correspondence including, but not limited to:
 - Letters to the bank
 - Letters from the bank
 - Notes, memoranda, etc. to the file
 - Collateral agreements and documents
 - Credit reports
 - Financial statements
 - Notes or other instruments reflecting the obligation to pay
 - Real estate mortgages, chattel mortgages, or other security instruments for loans
 - Forms 1099, 1089, or back-up withholding documents
 - Loan amortization statements

- All documents pertaining to CDs purchased or redeemed by or for the benefit of (corporate name) including, but not limited to:
 - Copies of the certificates
 - Corporate board authorization minutes or partnership resolutions
 - Documents (checks, debit memos, cash receipts, wire transfer documents, etc.) reflecting the means by which the CD was purchased
 - Documents (bank checks, credit memos, wire transfer documents, etc.) reflecting disbursement of the proceeds of any negotiated CD
 - Records reflecting interest earned, withdrawn, or reinvested
 - Records reflecting roll-overs
 - Forms 1099, 1089, or back-up withholding documents

- All documents pertaining to open or closed investment or security custodian accounts, IRA, Keogh, or other retirement plans in the name of, for the benefit of, or under the control of (corporate name) including, but not limited to:
 - Documents (checks, debit memos, cash receipts, wire transfer documents, etc.) reflecting the means by which the security was purchased

- Documents (bank checks, credit memos, wire transfer documents, etc.) reflecting disbursement of the proceeds of any negotiated securities
- Confirmation slips
- Monthly statements
- Payment receipts
- Safekeeping records and logs
- Receipts for receipt or delivery of securities
- Forms 1099, 1089, or back-up withholding documents

- Bank correspondence files

- All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, or money orders purchased or negotiated by or on behalf of (corporate name) including, but not limited to:
 - Documents (checks, debit memos, cash receipts, wire transfer documents, etc.) reflecting the means by which the checks or money orders were purchased
 - Documents (bank checks, credit memos, wire transfer documents, etc.) reflecting disbursement of the proceeds of any negotiated checks or money orders
 - Applications for purchase of checks or money orders
 - Retained copies of checks or money orders

- All documents pertaining to wire transfers sent or received by or on behalf of (corporate name) including, but not limited to:
 - Fed Wire, SWIFT, or other money transfer or message documents
 - Documents (checks, debit memos, cash receipts, wire transfer documents, etc.) reflecting the source of the funds wired out
 - Documents (bank checks, credit memos, wire transfer documents, etc.) reflecting the ultimate disposition of the funds wired in
 - Notes, memoranda, or other writings pertaining to the sending or receipt of wire transfers

- All documents pertaining to current or expired safe deposit box rentals in the name of, for the benefit of, or under the control of (corporate name) including, but not limited to:
 - Contracts
 - Entry records

- All documents pertaining to open or closed bank credit cards in the name of, for the benefit of, or under the control of (corporate name) including, but not limited to:
 - Applications for credit
 - Corporate board authorization minutes or partnership resolutions
 - Credit reports
 - Monthly statements
 - Financial statements
 - Charge tickets
 - Documents (checks, debit memos, cash receipts, wire transfer documents, etc.) reflecting payments on the account

- All documents relating to (corporate name's) formation including, but not limited to:
 - Articles of incorporation
 - By laws
 - Minute book
 - Stock book
 - Stock transfer records
 - Annual reports filed with the state of incorporation

- All documents summarizing annual, quarterly, monthly, weekly, or daily financial performance including, but not limited to:
 - Annual auditor's report
 - Annual financial statements including, but not limited to:
 - Balance sheet
 - Statement of operations (profit and loss statement)

- Annual filings with the SEC or other federal or state agencies or regulatory bodies
- Trial balances
- Federal and state income tax returns and quarterly estimated tax returns
- Sales tax returns
- Periodic reports required to be filed by the SEC, CFTC, or other regulatory body

With respect to transactions between (corporate name) and (names), provide the following documents for the period (dates):

- Employment records including, but not limited to:
 - Payroll journal
 - Annual recap of wages paid (filed with the Internal Revenue Service)
 - All Forms W-2 issued
 - All Forms 940 and 941 filed
 - All state employment and unemployment returns filed
 - All checks, or other payment documents issued as salary, commission or other earned income payments to (names)
 - All contracts or other agreements made or entered into between (corporate name) and (names)
- Any and all correspondence, letters, files or other documents reflecting telephone conversations, meetings, contracts, agreements, or transactions between (corporate name) and (names)
- Copies of all documents in (corporate name's) books of original entry containing entries reflecting any and all transactions between (corporate name) and (names) including, but not limited to:
 - General ledgers
 - General journals
 - Summary journals including, but not limited to:
 - Sales journals
 - Purchase journals

- Cash receipts journals
- Cash disbursements journals

- Invoices
- Sales receipts
- Purchase orders
- Receiving reports
- Inventory records

* * * * *

Credit Card Company Records

... to bring with you and produce:

The following documents for all open or closed credit card accounts bearing the signatory authority of and/or in the name of (names), and credit card number(s) (numbers), for the period _____ to _____ including, but not limited to:

- Applications for credit
- Corporate board authorization minutes or partnership resolutions
- Financial statements
- Monthly statements
- Charge tickets
- Documents (bank checks, personal checks, money orders, wire transfers in, etc.) reflecting payments on the account
- Correspondence files

* * * * *

Telephone Company Records

... to bring with you and produce:

All telephone subscriber information for telephone numbers (numbers) or in the name(s) of (names), for the period _____ to _____ including, but not limited to:

- Applications for telephone service
- Monthly billings
- Documentation listing all toll calls and long distance calls

* * * * *

Securities Firm Records

... to bring with you and produce:

Retained copies of all documents relating to any and all securities transactions in the name(s) of (account names) or under the account number(s) of (account numbers), for the period _____ to _____ including, but not limited to:

Account statements for all accounts including, but not limited to:

- Cash accounts
- Margin accounts
- Mutual fund accounts
- Limited partnership accounts
- IRA accounts
- KEOGH accounts
- Cash management accounts

- Applications to open all accounts
- Cash received and delivered blotters
- Confirmation slips
- Corporate board and partnership resolutions
- CTRs and CMIRs
- Customer correspondence files
- Payment receipts (currency, check, wire, and securities)
- Securities position records
- Stock certificate or bonds
- Stock delivery receipts

* * * * *

Debriefing Informants

Who are the Members of the Group?

- How do you know?
- What evidence do you have?
 - Phone books
 - Toll records
 - Photographs
- What role does each member have?
- What are the relationships among the members?
- Who are the key people?
- Who are their friends?
- Who are their girlfriends or boyfriends?

What are all the Criminal Enterprises of the Group?

- Critical to know for affidavit wording
 - Money launderers have certain records
 - Traffickers have different records
- The affiant's experience identifies which types of records are maintained by which type of criminal enterprise

What are the Receipts of the Criminal Enterprises?

- What volume of drugs are distributed per week, month, or year?
- What are the expenses?
 - Personnel
 - Stash house
 - Car rentals
 - Cellular phones, etc.

Gross receipts (or cash on hand) = Drugs sold per week - (cost of drugs + additional expenses)

Use to show probable cause that cash will be on premises

What is the purity of the drugs received from the source?

What is the purity of the drugs when sold?

On what days are collections of drug proceeds made?

Where are collections made?

From whom are collections made?

Who makes the collections?

What denominations of currency are received?

What does the organization do with the collections?

Is there a counting house?

Does the organization use a launderer?

Is the currency converted to larger bills?

Is the currency converted to money orders, checks, or other financial instruments?

Is the currency deposited into bank accounts or through other financial institutions?

Name and address of institution

Account numbers

Officer or branch used

Is the currency negotiated through one or more businesses?

What Front Companies are Used?

Where do they bank?

Who is their accountant?

Who is their bookkeeper?

Who is their stock broker?

Who is their real estate broker?

Where do they receive mail from?

Who is their attorney?

- Does the same attorney represent all the companies?
- Is the attorney compromised?
 - How is he/she compromised?
 - How is the attorney paid?

What Records do the Companies or Principals Maintain?

- What computers do they use?
- What computer software do they use?
- Where are the records kept?
 - Where did the informant see the records?
 - Who else was present?
- Who keeps the records?
- Who are the company's customers?
- Who are the company's suppliers?
- Who hauls the company's trash?
- Do any of the subjects carry phone directories or computer data banks on their person?
- What is their beeper or cellular phone number?

What Assets do the Subjects or their Companies Own?

- Real estate
 - Who owns it?
 - Who is the registered owner?
 - When was the property bought?
 - Who was it purchased from?
 - How was it paid for?
- What cars visit the property?
- Is there evidence of the subject's arrivals and departures?
- Where does the mail to the property come from?
- Who uses the property as a return address?
- Who pays for the phone and utilities?

- Do any of the subjects own:
 - Expensive jewelry
 - Furs
 - Cars
 - Boats
 - Planes
 - Gold or other precious metals
 - Art work
 - Antiques

- What are the details of the purchase?
 - When did they buy it?
 - Where did they buy it?
 - From whom did they buy it?
 - How did they pay for it?
 - Where is the property stored?
 - Who is the registered owner?

- Do any of the subjects keep large amounts of cash:
 - On their person
 - In their house
 - In their office
 - In their vehicle
 - In a bank safe deposit box
 - Elsewhere

- Is the cash hidden?
- Have they built hidden stash locations in their house or office?

What are the Favorite Places of Entertainment?

- What credit cards do the subjects use?
- What are their shopping habits?
- What stores do they frequent?
- Do they buy with cash, check, or credit card?
- What trips have they taken?

- Do they gamble?
 - What types of gambling are they involved in?
 - Casinos
 - Sports
 - Floating crap games
 - Other bookmaking
 - Do they have a favorite bookie?
 - Do they have casino accounts?
- Where do they go on vacation?
 - What travel agent do they use?
 - When did they go?
 - Where did they go?
 - What is their favorite vacation spot?
 - What airlines do they use?
 - What rental car companies do they use?